

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

MAR 28 2025

RICK WARREN
COURT CLERK

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To: Oklahoma County District Court

Attn: County Clerk – Rick Warren

320 Robert S. Kerr Ave,
409 County Office Bldg,
Oklahoma City, OK 73102

CC: The Handley Law Center & Geoffrey C. Parker, ESQ. at Hilton Parker, LLC

March 25th, 2025

To: Rick Warren,

I am writing you today in regard to a summons I received from The Handley Law Center of El Reno, OK (Fletcher D. Handly, Jr.) on Saturday, March 22nd, 2025.

Case No. – CJ-2025-1850 (Copy of Summons Cover Page(s) enclosed).

Although my name is Michael Wiley and I do reside at 1701 Wildhorse Drive, Edmond, OK 73003, **I am NOT the Michael Wiley being referenced in the Summons.** My full name is Michael Alan Wiley and my date of Birth is 11/30/1968.

I have never owned, worked for, or managed day to day operations at the Plaza Inn. I have never even been to the Plaza Inn. Furthermore, I do not know, nor have I ever associated with the Plaintiff or any other person or entity listed in the summons.

I have been working full time for the past 18 years as the Laboratory Manager at Cattle Stats, LLC in Oklahoma City, which is a Bovine Diagnostics Testing Lab (CattleStats.com). I have lived at my current address at 1701 Wildhorse Drive in Edmond, OK since 2017. I can supply, upon request, any other support documents you may need to verify that I am NOT the Michael Wiley that is referenced in this summons (Driver's License, Work Documents, etc.).

I am requesting a withdraw, dismissal or amendment to the current summons to remove my address from it so as not to have my address associated with this summons or case. Again, I can answer any questions or provide any supporting documents that may be necessary to show that I am not the Michael Wiley that is referenced in this summons.

I am also requesting a response in writing or via email acknowledging receipt of this response letter and informing me if there is anything else I need to do regarding this summons.

I am sending a copy of this response to The Handley Law Center in El Reno, OK, as well as Geoffrey C. Parker, ESQ. at Hilton Parker LLC in Reynoldsburg, OH.

Sincerely,

Michael A. Wiley
1701 Wildhorse Dr.
Edmond, OK 73003
Phone: 405-694-8195
Email: mwiley21@cox.net

EXHIBIT

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IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

NANCY R., pseudonymously,

Plaintiff,

vs.

Case No. **CJ - 2025 - 18504**

PLAZA HOTELS, LLC;
STEVE KETTER;
MICHAEL WILEY;
OKC AIRPORT ES, LLC;
ESH STRATEGIES FRANCHISE, LLC;
KAJAL HOSPITALITY, LLC;
JALIYAN HOSPITALITY, INC;
SUPER 8 WORLDWIDE, INC;
RAJ KRUPA HOTEL, LLC;
DAYS INNS WORLDWIDE, INC;
CHAND & SAAJ HOSPITALITY, INC;
RAMADA WORLDWIDE, INC;
YASH ENTERPRISES, INC;
HOWARD JOHNSON INTERNATIONAL,
INC;
NOOR HOTEL, LLC;
AMBICA, LLC;
OM, LLC;
INDRA, LLC; AND
G6 HOSPITALITY FRANCHISING, LLC,

Defendants.

SUMMONS

TO THE ABOVE-NAMED DEFENDANT:

Michael Wiley
1701 Wildhorse Drive
Edmond, OK 73003

You have been sued by the above-named Plaintiff, and you are directed to file a written answer to the attached Petition in the Court at the above address within twenty (20) days after service of this Summons upon you, exclusive of the day of service. Within the same time, a copy of your answer must be delivered or mailed to the attorney for the Plaintiff.

Unless you answer the Petition within the time stated, judgement will be rendered against you with the costs of the action.

Issued this 19th day of March, 2025.

RICK WARREN, Court Clerk
COURT CLERK

By: 
Deputy Court Clerk

THE HANDLEY LAW CENTER

111 S. Rock Island Ave.

P.O. Box 310

El Reno, OK 73036

Office: (405) 295-1924

Telephone: (405) 295-1924

Facsimile: (405) 262-3531

fdh@handleylaw.com

By: 
Fletcher D. Handley, OBA #3797

GEOFFREY C. PARKER, ESQ.

(Pro Hac Vice forthcoming)

Hilton Parker LLC

7658 Slate Ridge Blvd.

Reynoldsburg, OH 43068

Tel: (614) 992-2277

Fax: (614) 927-5980

Email: gparker@hiltonparker.com

MICHAEL C. KANE, ESQ.

(Pro Hac Vice forthcoming)

THE702FIRM INJURY ATTORNEYS

400 South 7th Street, Suite 400

Las Vegas, Nevada 89101

Tel: (702) 776-3333

Fax: (702) 505-9787

Email: service@the702firm.com

Attorneys for Plaintiff Nancy R.

YOU MAY SEEK THE ADVICE OF AN ATTORNEY ON ANY MATTER CONNECTED WITH THIS SUIT OR YOUR ANSWER. SUCH ATTORNEY SHOULD BE CONSULTED IMMEDIATELY SO THAT AN ANSWER MAY BE FILED WITHIN THE TIME LIMIT STATED IN THE SUMMONS.

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

NANCY R., pseudonymously,

Plaintiff,

vs.

PLAZA HOTELS, LLC;
STEVE KETTER;
MICHAEL WILEY;
OKC AIRPORT ES, LLC;
ESH STRATEGIES FRANCHISE, LLC;
KAJAL HOSPITALITY, LLC;
JALIYAN HOSPITALITY, INC;
SUPER 8 WORLDWIDE, INC;
RAJ KRUPA HOTEL, LLC;
DAYS INNS WORLDWIDE, INC;
CHAND & SAAJ HOSPITALITY, INC;
RAMADA WORLDWIDE, INC;
YASH ENTERPRISES, INC;
HOWARD JOHNSON INTERNATIONAL,
INC;
NOOR HOTEL, LLC;
AMBICA, LLC;
OM, LLC;
INDRA, LLC; AND
G6 HOSPITALITY FRANCHISING, LLC,

Defendants.

Case No. **25-2025-1850**

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OKLAHOMA COUNTY**

MAR 19 2025

**RICK WARREN
COURT CLERK**

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PETITION

COMES NOW the Plaintiff, NANCY R., by and through her attorneys, Michael C. Kane, Esq., Bradley J. Myers, Esq., and Joel S. Hengstler, Esq. of The702 Firm, Geoffrey C. Parker, Esq. and Jonathan Hilton, Esq. of Hilton Parker LLC, and Fletcher D. Handley, Jr. of The Handley Law Center states as follows: